

**Food Standards Scotland  
Communications of an FSS Board Member  
1 April 2019**

**Correspondence 1**

**From:** [Redacted]  
**Sent:** 24 May 2018 15:15  
**To:** Carrie Ruxton  
**Cc:** Geoff Ogle  
**Subject:** QMS planned promotion of red meat

Carrie,

A couple of points , with respect to your quote (pasted below), supporting QMS activity in response to WCRF advice:

1. It would be helpful if you could make it clear that government/ FSS dietary advice does not demonise red meat
- 2 . With respect your reference to sausages and burgers, the evidence does not support the view that the majority of sausages and burgers produced in the **UK** do not fall into this ( i.e. processed meat category). We have been looking at this recently and **UK** sausages do contain preservatives (sulphites) as do most burgers (with the exception of some frozen burgers which do not appear to contain preservatives). The addition of preservatives to burgers and sausages may be different elsewhere.

Grateful if you could amend if possible.

Many thanks  
[Redacted]

“When this is considered alongside the report’s assertion that red meat is a source of many vital nutrients and that the advice is not to cut out red meat, this should signal the end of the demonisation of red meat as a single source of cancer. Under the WCRF’s definition of processed red meat\*, the overwhelming majority of sausages and burgers produced in the UK would not fall into this category.”

[Redacted]  
[Redacted] Nutrition Science and Policy  
Food Standards Scotland  
3rd Floor, Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL  
01224 285100

## Correspondence 2

**From:** Carrie Ruxton  
**Sent:** 24 May 2018 16:07  
**To:** [Redacted]  
**Cc:** Geoff Ogle; [Redacted]  
**Subject:** RE: QMS planned promotion of red meat

Dear [Redacted]

Thank you for your comments. I'm copying in [Redacted] from AHDB as my quote was provided to them, not to QMS, and he will be able to instruct the PR agency on amendments.

The demonization comment was directed at the wider media debate which has placed red meat on a par with tobacco as a cause of cancer. This, and interventions from lobbying organisations have indeed demonised red meat as a single source of cancer. I'm happy to clarify that the comment was not directed at Government by amending it to: "this should signal the end of the **media** demonisation of red meat as a single source of cancer".

Regarding processed meat, IARC defined this as "meat that has been transformed through salting, curing, fermentation, smoking, or other processes to enhance flavour or improve preservation". These processes have been identified as possible contributors to cancer. However, the common preservatives used in fresh meat products have been cleared in assessments by EFSA 2016 and SACN 2010, with the latter concluding: "The data do not suggest that commonly used food additives used in preserved meats are the basis for the link between processed meat intake and CRC".

WCRF seemed to accept this argument in 2016 when I emailed them about it (trail shown below) therefore it seems reasonable to assume that the majority of fresh meat products do not come under the category of potentially carcinogenic meats defined in WCRF's advice to the public. I would be concerned if any new communication on processed meat brought fresh sausages and burgers into the 'potentially carcinogenic' category as this would appear to conflict with SACN's advice.

Best wishes  
Carrie

Dear Carrie

Thank you for the information on sulphates and sulphites. We base the definition of processed meat on the definitions used in the epidemiological studies. As you know the definition varies from study to study so it's hard to come up with a more precise definition. We don't have information on various types of processed meat from epidemiological studies to assess each risk regarding specific types of processed meats.

Although our definition is not precise we do say that burgers and many types of sausages should count as fresh red meat rather than processed meat.

Best wishes

--

[Redacted]

[Redacted]

**World Cancer Research Fund International - In official relations with the World Health Organization (WHO) since 2016**

Second Floor, 22 Bedford Square, London WC1B 3HH

Phone: +44 (0)20 7343 4200

Email: [\[Redacted\]@wcrf.org](mailto:[Redacted]@wcrf.org)

[www.wcrf.org](http://www.wcrf.org)

[Twitter](#) | [Facebook](#) | [Blog](#)

*Cancer Prevention Together We Can*

**World Cancer Research Fund International is holding a conference jointly with World Obesity Federation on 1-2 September 2016, London, UK. The theme is Life Course Influences and Mechanisms: Obesity, Physical Activity and Cancer. Find out more details including the conference programme [here](#).**

On 22 Jun 2016, at 14:21, Dr Carrie Ruxton wrote:

Dear [Redacted]

I just wanted to come back on the WCRF processed meat definition, which includes all meats with added preservatives, as this seems to conflict with EFSA and SACN opinions.

The 2010 SACN Iron and Health report said:

**“Sulphates and sulphites (page 319)**

Regulatory aspects

19. Sodium sulphate and sodium hydrogen sulphate (E514), potassium sulphate and potassium hydrogen sulphate (E515), and calcium sulphate (E516) are permitted in all preserved meats but not fresh meats or poultry. Sodium sulphite (E221), sodium hydrogen sulphite (E222), sodium metabisulphite (E223), potassium metabisulphite (E224) and calcium sulphite (E226) are **all permitted for use in burgers or breakfast sausages.**

20. In 2000, JECFA assessed the safety of sodium sulphate and derived a temporary ADI “not specified” indicating **no concerns over the use of this additive in foods when following good manufacturing practice** (WHO, 2000). In 1999, JECFA reconfirmed the

ADI set in 1986 of 0.7 mg/kg bw/day based on an eight-week animal study where gastric lesions were observed at doses above 70 mg/kg bw/day.

21. These substances, in common with all additives, have been rigorously assessed for safety by JECFA and other international experts. Sulphate compounds are endogenous in the body and long-term carcinogenicity studies using both sulphates and sulphites have shown **no carcinogenic effect**. Some in vitro studies of the mutagenicity of sulphites have produced positive results but these are **not confirmed by in vivo data** (WHO, 1986; WHO 1999).

#### Conclusion

22. **No data have been identified** that support a hypothesis that sulphate preservatives used in preserved meats could be linked to CRC.

#### Overall conclusion on preservatives

23. **The data do not suggest that commonly used food additives used in preserved meats are the basis for the link between processed meat intake and CRC**".

In addition, EFSA assessed the safety of sulphur-based preservatives this year and noted that there was insufficient evidence for a cancer risk if intakes were below the Acceptable Daily Intake [http://www.efsa.europa.eu/sites/default/files/scientific\\_output/files/main\\_documents/4438.pdf](http://www.efsa.europa.eu/sites/default/files/scientific_output/files/main_documents/4438.pdf) As the EFSA report stated, sulphur-based preservatives are added to several other foods such as dried fruit, wine and fruit juices. I am not aware of these foods being linked with colorectal cancer.

While I realise that WCRF may not wish to recommend commercial burgers and sausages due to their salt or fat content, and quite rightly signposts people to moderate amounts of fresh red meat, I am wondering if the inclusion of non-cured burgers and sausages in the 'processed meat' category, which implies a strong cancer risk, is actually misleading. Surely if the preservatives themselves have been cleared regarding colo-rectal cancer risk, the products themselves would present no more of a risk than fresh red meat?

I would welcome the opportunity for further discussion and clarification as, within my role on the Meat Advisory Panel, I have always tried to align my advice to the public, media and health professionals with SACN and WCRF.

With best wishes  
Carrie

### Correspondence 3

**From:** [Redacted]

**Sent:** 24 May 2018 17:40

**To:** Carrie Ruxton

**Cc:** Geoff Ogle; [Redacted]

**Subject:** RE: QMS planned promotion of red meat

Carrie,

Thanks very much for getting back to me.

The WRCF definition of processed is meat (below) is unclear and hard to interpret given that most burgers and sausages have salt and chemical preservatives added and, as far as I can see, the report doesn't single out specific preservatives as being either carcinogenic or non carcinogenic. It also cites other possible ways in which red and processed meat may be carcinogenic, such as involvement of the haem molecule. <https://www.wcrf-uk.org/uk/preventing-cancer/what-can-increase-your-risk-cancer/red-and-processed-meat-and-cancer-risk>

SACN were unable, from the evidence, to split red and red processed meat but, in their report, they do give the example of burgers as a processed meat. The SACN recommendations and the current Scottish Dietary Goal for red and processed meat do not distinguish between the two.

Aside from a link between colorectal risk and red and processed meat, promotion of processed meat products (including burgers and sausages) does not align with dietary recommendations to reduce saturated fat and salt in the Scottish Diet. It is important that our public health nutrition advice fits together in the round (as demonstrated by the Eatwell Guide and as set out in the full suite of the Scottish Dietary Goals). From our perspective, we need to consider meeting all our dietary recommendations/goals and not just one when we provide advice for consumers.

Regards,  
[Redacted]

WCRF definition of processed meat

Processed meat has been smoked, cured or had salt or chemical preservatives added rather than having just been cooked or reformed (like most sausages and burgers). This includes bacon, salami, chorizo, corned beef, pepperoni, pastrami, hot dogs and all types of ham.

[Redacted]

[Redacted] Nutrition Science and Policy

Food Standards Scotland

3rd Floor, Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL

01224 285100